



405475



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 W. JACKSON BLVD

CHICAGO, IL 60604

16 SEP 2011

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for Approval and Funding for a Time-Critical Removal Action at the Superior Cleaning Solutions Site, Dayton, Montgomery County, Ohio (Site ID #C557)

FROM: Steve Renninger, OSC
Emergency Response Branch 1

THRU: Jason H. El-Zein, Chief
Emergency Response Branch 1

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to \$305,949 to conduct a time-critical removal action at the Superior Cleaning Solutions (SCS) Site (the Site) in Dayton, Montgomery County, Ohio

The response actions proposed herein are necessary in order to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site, an abandoned former chemical distribution facility. The presence of hazardous substances existing at the Site has been documented, including flammable and corrosive waste streams.

The time-critical removal action proposed herein will mitigate the threats by properly identifying, consolidating, packaging, and ultimately removing and disposing off-site the abandoned hazardous substances, pollutants and contaminants at a CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440). Additional Site activities will include Site security and perimeter air monitoring.

This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(a)(1), and 40 C.F.R. § 300.415 (*Removal action*) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) to abate or eliminate the immediate threats posed to public health and/or the environment.

The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as a time-critical removal action. The project will require approximately 20 working days to complete.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: OHN 000510610

Category: Time-Critical Removal Action

The SCS facility operated as a chemical distribution facility from the 1980s to approximately 2008. The Site is currently abandoned.

A. Site Conditions and Background

1. Removal Site Evaluation

a) Site Background

The SCS Site is an abandoned manufacturing facility located at 1224 Keowee Street, Dayton, Ohio. The current owner of the Site is James R. Moore who purchased the Site through a sheriff's tax sale of the property on January 21, 2011.

The prior owner and operator of the site were John and Cindy Harley. John Harley was a principal of Superior Cleaning Solution, LLC. John Harley and Superior Cleaning Solution also conducted business under the name Chemical Management, which operated a company that degreased restaurant equipment.

The current owner of the property, James R. Moore, previously owned the property and sold the property on June 26, 2003, to John and Cindy Harley. Prior to the sale, a furniture store rented the Site building to recondition wood furniture and cabinets. The Site was also utilized in the past as a radiator repair shop.

Chemical Management (CM) operated at the Site most recently and sold industrial cleaning supplies. CM specialized in chemical and service needs for restaurants, nursing homes, and the hospitality industry. According to a 2007 CM product brochure, CM manufactured numerous products from the highest-grade surfactants, alkalis, silicates, and polymers. A 2007 product schedule included detergents (containing sodium hydroxide), rinse additives (containing phosphoric acid), flatware pre-soak (containing sodium hypochlorite), scale removers (containing phosphoric acid) and kitchen degreasers (containing alkalis, glycol ether).

b) Site Background – Dayton Fire Department

On June 28, 2011, the Dayton Fire Department (DFD) inspected the vacant SCS Site. The DFD noted that the facility appeared to contain abandoned flammable and corrosive materials stored in excess of the Dayton Fire Code for inside storage. The DFD also noted that abandoned drums were stored outside the facility that required proper characterization. In a letter dated July 8, 2011, DFD formally requested assistance from U.S. EPA to determine if the Site meets the criteria for removal action (Dayton Fire Department, July 2011).

c) Site Background – Ohio EPA

In a letter dated August 10, 2011, the Ohio EPA formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a removal action (Ohio EPA, August 2011). Ohio EPA noted that the site was abandoned since 2008 and there was an immediate exposure risk due to the unknown drum wastes and possible release of these wastes.

2. Physical Location

The SCS Site is located at 1224 North Keowee Street in Dayton, Montgomery County, Ohio 45212 (Figure A-1). The geographical coordinates for the Site are 39° 46' 50.2" North latitude and 84° 11' 12.9" West longitude. The Site contains 1 building and is located in a mixed commercial and residential area. The Site is bordered to the north by a used car dealer, Deals for Wheels; to the east by residential properties; to the south by a commercial property, Boeckman Meets; and to the west by North Keowee Street and a vacant lot which formerly consisted of public housing (Figure A-2). Commercial businesses are located within 20 feet of the Site, and the closest residences are located 50 feet east of the Site.

The area surrounding the Superior Cleaning Solutions Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to U.S. EPA Region 5. The Superior Cleaning Solutions Site is in a census tract with a score of 1. Therefore, Region 5 considers this site to be a high-priority potential EJ area of concern. (Attachment III). Please refer to the attached analysis for additional information.

3. Site Characteristics

On August 3, 2011, U.S. EPA mobilized to the Site and conducted an inspection of the facility and observed approximately 150 55-gallon drums and approximately 200 containers (5-gallons or less). During the inspection, the OSC documented leaking drums and containers throughout the Site. Drum contents were spilled on the floor in numerous locations including the floor drain area. Many of drums and containers contained labels

such as “Flammable Liquid”, “Corrosive”, “Hydrochloric Acid”, “Xylene”, and “Caustic Soda”. Abandoned drums were documented inside the Site building and outdoors between the Site building and adjacent commercial property.

On August 3, 2011, OSC Renninger and U.S. EPA’s Superfund Technical Assessment and Response Team (START) contractor performed a Site Assessment (OTIE, August 2011). Activities performed during the Site Assessment included:

- Documenting Site conditions;
- Air monitoring;
- Collecting samples from drums, containers; and
- Submitting the samples for commercial laboratory analysis.

Analytical results from samples SCS-003, SCS-004, SCS-005, SCS-015, SCS-024, and SCS-025 documented liquid having flash points less than 140°F, which, according to 40 C.F.R. § 261.21, verifies the characteristic of a hazardous waste for ignitability (D001).

Analytical results from liquid samples SCS-002, SCS-006, SCS-012, SCS-020 and SCS-022 indicate pH levels less than 2.0 standard units, and analytical results from liquid samples SCS-010, SCS-013 and SCS-021 indicates a pH level greater than 12.5 standard units. All eight results, according to 40 C.F.R. § 261.22, verify the characteristic of a hazardous waste for corrosivity (D002).

Drums and containers were noted to be in a deteriorated condition with waste spilled on the floor in many locations. Analytical results from liquid sample SCS-003 documented xylene concentrations of 700,000 milligrams per liter (mg/L) and ethylbenzene concentrations of 180,000 milligrams per liter (mg/L). Table B-1 summarizes the U.S. EPA Site Assessment samples.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

A threat of release of hazardous substances, pollutants, or contaminants is present at the Site due to the presence of ignitable and corrosive wastes in drums and containers.

U.S. EPA documented the presence of hazardous substances during its Site Assessment activities conducted on August 3, 2011. The U.S. EPA Site Assessment Report, including analytical data, is included in the Administrative Record for the Site.

5. NPL status

The Site is not on the National Priorities List (NPL).

6. Maps, pictures and other graphic representations

Figure A-1 Site Location Map, Figure A-2 Site Layout Map, Figure A-3 Site Features Map, Figure A-4 Photos, and Attachment 1 - Environmental Justice (EJ) analysis are included as attachments.

B. Other Actions to Date

1. Previous actions

Previous actions by Ohio EPA and DFD have been documented in the Background section (Section II. A. 2).

2. Current actions

The Site has been documented to contain ignitable and corrosive hazardous waste in drums and containers. The Site is currently vacant, and the possibility exists that illegal trespassing could occur which may result in a potential exposure to public health or welfare or the environment.

C. State and Local Authorities' Roles

In a letter dated July 8, 2011, the DFD formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a removal action (Dayton Fire Department, July 2011). The DFD noted that the facility appeared to contain abandoned flammable and corrosive materials stored in excess of the Dayton Fire Code for inside storage. The DFD also noted that abandoned drums were stored outside the facility that required proper characterization.

In a letter dated August 10, 2011, the Ohio EPA formally requested assistance from U.S. EPA to determine if the Site meets the criteria for a removal action (Ohio EPA, August 2011).

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the SCS Site present a threat to the public health or welfare, and the environment, and meet the criteria for a time-critical removal action as provided for in the NCP, 40 C.F.R. § 300.415(b)(2). These criteria include, but are not limited to, the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

During the U.S. EPA Site Assessment, the U.S. EPA documented abandoned chemical waste including drums and containers containing ignitable and corrosive waste at the SCS Site.

Analytical results from samples SCS-003, SCS-004, SCS-005, SCS-015, SCS-024, and SCS-025 documented liquid having flash points less than 140°F, which, according to 40 C.F.R. § 261.21, verifies the characteristic of a hazardous waste for ignitability (D001).

Analytical results from liquid samples SCS-002, SCS-006, SCS-012, SCS-020 and SCS-022 indicate pH levels less than 2.0 standard units, and analytical results from liquid samples SCS-010, SCS-013 and SCS-021 indicates a pH level greater than 12.5 standard units. All eight results, according to 40 C.F.R. § 261.22, verify the characteristic of a hazardous waste for corrosivity (D002).

Drums and containers were noted to be in a deteriorated condition with waste spilled on the floor in many locations. Analytical results from liquid sample SCS-003 documented xylene concentrations of 700,000 milligrams per liter (mg/L) and ethylbenzene concentrations of 180,000 milligrams per liter (mg/L).

The toxicological effects of xylene have been studied by the Agency for Toxic Substances and Disease Registry (ATSDR) and/or EPA. Toxicological information is provided below and referenced in the Administrative Record (Attachment II).

Xylene – Xylene is a colorless, sweet smelling liquid that catches on fire easily. Xylene is used as a solvent and in the printing, rubber, and leather industries. It is also used as a cleaning agent, a thinner for paint, and in paints and varnishes. Xylene can be absorbed through the respiratory tract and through the skin. Exposure of people to high levels of xylene for short periods can cause irritation of the skin, eyes, nose, and throat, difficulty in breathing, problems with the lungs, delayed reaction time, and stomach discomfort. It can cause unconsciousness and even death at very high levels (ATSDR, August 2007).

Commercial businesses are located within 20 feet of the Site and residential locations are located within 50 feet of the Site. The Site is locked and there is a perimeter fence around the outdoor drum area. Even with the restricted access onto the Site, trespassing may still occur and an accidental or intentional release of hazardous material and contact with hazardous materials is possible. The close proximity of residential areas and commercial businesses immediately adjacent to the Site would greatly increase the likelihood of human health and environmental impacts should such an occurrence take place. The drums and containers of hazardous materials are located in the Site building and outdoors with no secondary containment. There is visible drum spilled material on the floor and there is a potential that the waste could migrate into the nearby sewer drain. Potential exposure could occur through each of these migration pathways and cause imminent endangerment to human health and the environment.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release;

During the U.S. EPA Site Assessment, the OSC observed and documented the presence of approximately 150 55-gallon drums, 10 totes, and 200 small containers (5-gallons or less). Many of drums and containers contained labels such as “Flammable

Liquid”, “Corrosive”, “Hydrochloric Acid”, “Xylene”, and “Caustic Soda.” Numerous drums were in poor condition and leaking.

U.S. EPA samples confirmed the presence of ignitable and corrosive hazardous waste at the SCS Site. Analytical results are provided in Table B-1. Drum contents were observed spilled onto the floor and adjacent floor drain area. Numerous drums and containers were uncovered and deteriorating, with visible waste spilled onto the floor in various areas on-site. Continued deterioration of the containers on Site may allow additional quantities of hazardous substances to migrate into the environment.

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

Southwestern Ohio receives a substantial amount of precipitation during spring, and winter temperatures are normally below freezing with regular snowfall. Weather conditions will contribute to the further deterioration of the building and waste drums inside and outside of the Site building. The building is abandoned and the electricity service has been turned off. There is nothing to prevent freezing and thawing of the contents in the drums, totes and containers.

Threat of fire or explosion;

Analytical results from the U. S. EPA Site Assessment documented that material in drums and containers were flammable wastes and pose a threat of fire or explosion. U.S. EPA documented six liquid samples having flashpoint results below 140 °F, which is the criteria for ignitibility for a RCRA characteristic waste. As such, these materials represent a threat of fire or explosion.

The availability of other appropriate Federal or state response mechanisms to respond to the release;

Ohio EPA does not have the resources to respond to this Site. In a letter dated August 10, 2011, Ohio EPA formally requested assistance from U.S. EPA to determine if the SCS Site met the criteria for a removal action (Ohio EPA, August 2011).

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

1. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Inventory, sample, and perform hazard characterization, in compliance with a Site-specific QA/QC Plan, on all substances contained in drums, containers, and totes;
4. Consolidate and package all hazardous substances, pollutants and contaminants for transportation and off-site disposal;
5. Transport and dispose of all characterized or identified hazardous substances, pollutants, wastes, or contaminants at a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 C.F.R. § 300.440).
6. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the U.S. EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

The removal action will be conducted in a manner not inconsistent with the National Contingency Plan (NCP). The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(l) of the NCP.

Off-Site Rule

All hazardous substances, pollutants, or contaminants removed off-Site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

2. Contribution to remedial performance:

The proposed action will not impede future actions based on available information. At this time it is not known if long-term remedial actions will be needed for the Site.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable

Applicable or relevant and appropriate requirements (ARARs)

All applicable and relevant and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable. The OSC submitted a letter dated August 11, 2011, to Cathy Altman, Ohio EPA Southwest District Office, requesting state ARARs for the SCS Site (U.S. EPA, August 2011). Any state ARARs identified in a timely manner will be complied with to the extent practicable.

All hazardous substances, pollutants or contaminants removed off Site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

4. Project Schedule

The removal activities are expected to take 20 on-site working days to complete.

Estimated Costs

The detailed cleanup contractor cost is presented in Attachment I and the Independent Government Cost Estimate is presented in Attachment IV. Estimated project costs are summarized below:

<u>Regional Removal Allowance Costs</u>	
Total Cleanup Contractor Costs (Includes a 20% contingency)	\$233,043
<u>Other Extramural Costs Not Funded from the Regional Allowance</u>	
Total START, including multiplier costs	\$33,000
Subtotal, Extramural Costs	\$266,043
Extramural Costs Contingency (15% of Subtotal, Extramural Costs)	\$39,906
TOTAL REMOVAL ACTION PROJECT CEILING	\$305,949

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the Site conditions, the nature of the hazardous substances and pollutants or contaminants documented on Site, and the potential exposure pathways to nearby populations described in Section II, III, IV, and V above, actual or threatened releases of hazardous substances and pollutants or contaminants from this Site, if not addressed by implementing or delaying the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment, increasing the potential that hazardous substances will be released, thereby threatening the adjacent population and the environment.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total U.S. EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$569,447.¹

$$(\$305,949 + \$43,920) + (62.76\% \times \$349,869) = \$569,447$$

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

IX. RECOMMENDATION

This decision document represents the selected removal action for the SCS Site, located in Dayton, Montgomery County, Ohio, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record (Attachment II) for the Site. Conditions at the Site meet the NCP Section 300.415(b) criteria for a removal, and I recommend your approval of the proposed removal action.

The total removal action project ceiling, if approved, will be \$305,949. Of this, as much as \$272,949 comes from the Regional removal allowance.

APPROVE


Director, Superfund Division

DATE:

9/16/2011

DISAPPROVE

Director, Superfund Division

DATE:

Enforcement Addendum

Figures:

- A-1 Site Location Map
- A-2 Site Layout Map
- A-3 Site Features Map
- A-4 Photographic Documentation

Tables:

- B-1 U.S. EPA Analytical Results

Attachments:

- I. Detailed Cleanup Contractor Cost Estimate
- II. Administrative Record Index
- III. Region V EJ Analysis
- IV. Independent Government Cost Estimate

cc:

S. Fielding, U.S. EPA 5202G
M. Chezik, U.S. Department of Interior, **w/o Enf. Attachment**
(email: michael_chezik@ios.doi.gov)
Scott Nally, Director, Ohio EPA, **w/o Enf. Addendum**
(email: Scott.Nally@epa.state.oh.us)
Mike DeWine, Ohio Attorney General, **w/o Enf. Addendum**
(email: Mike.DeWine@ohioattorneygeneral.gov)

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ENFORCEMENT ADDENDUM

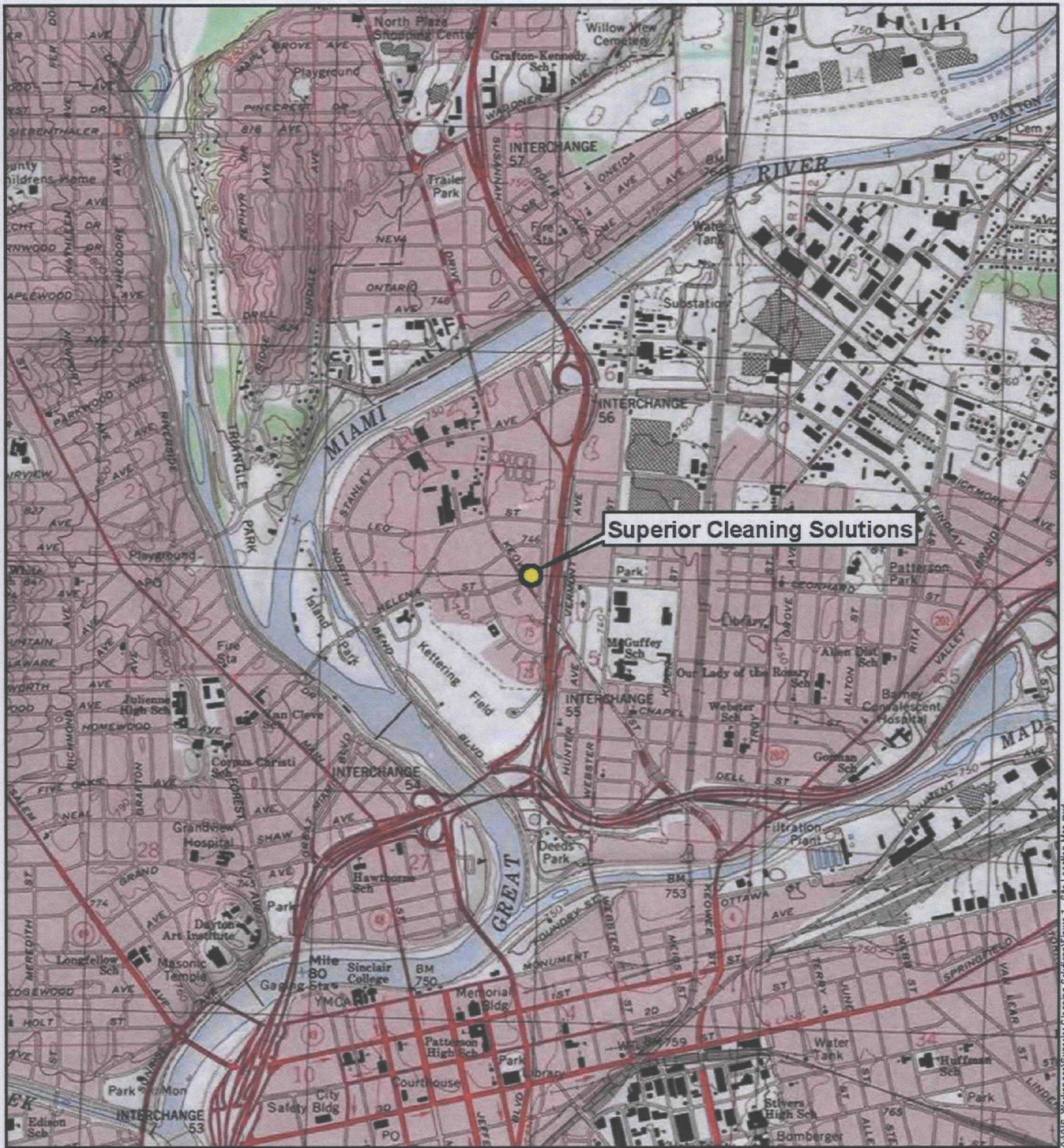
**SUPERIOR CLEANING SOLUTIONS SITE
DAYTON, MONTGOMERY COUNTY, OHIO**

SEPTEMBER 2011

**ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY**

(REDACTED 1 PAGE)


FIGURE A-1
SITE LOCATION MAP



USGS 7.5 MINUTE SOURCE QUAD MAP (OHIO): DAYTON NORTH

Disclaimer: This map is intended for visual orientation use only. In no way is this map to be used for precise locational use.

Legend

 Site Location

0 2,000 4,000 Feet



Dayton,
Montgomery County,
Ohio



United States Environmental Protection Agency

SUPERIOR CLEANING SOLUTIONS
DAYTON, MONTGOMERY COUNTY,
OHIO

TDD No. TO-05-11-06-0016

FIGURE A-1
SITE LOCATION MAP



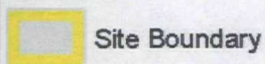
FIGURE A-2
SITE LAYOUT MAP



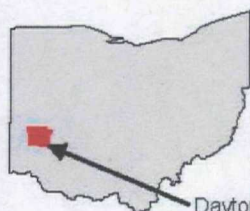
AERIAL SOURCE: BING MAPS HYBRID

Disclaimer: This map is intended for visual orientation use only.
In no way is this map to be used for precise locational use.

Legend



0 60 120 Feet



Dayton,
Montgomery County,
Ohio



United States Environmental Protection Agency

SUPERIOR CLEANING SOLUTIONS
DAYTON, MONTGOMERY COUNTY,
OHIO

TDD No. TO-05-11-06-0016

FIGURE A-2
SITE LAYOUT MAP



FIGURE A-3
SITE FEATURES MAP

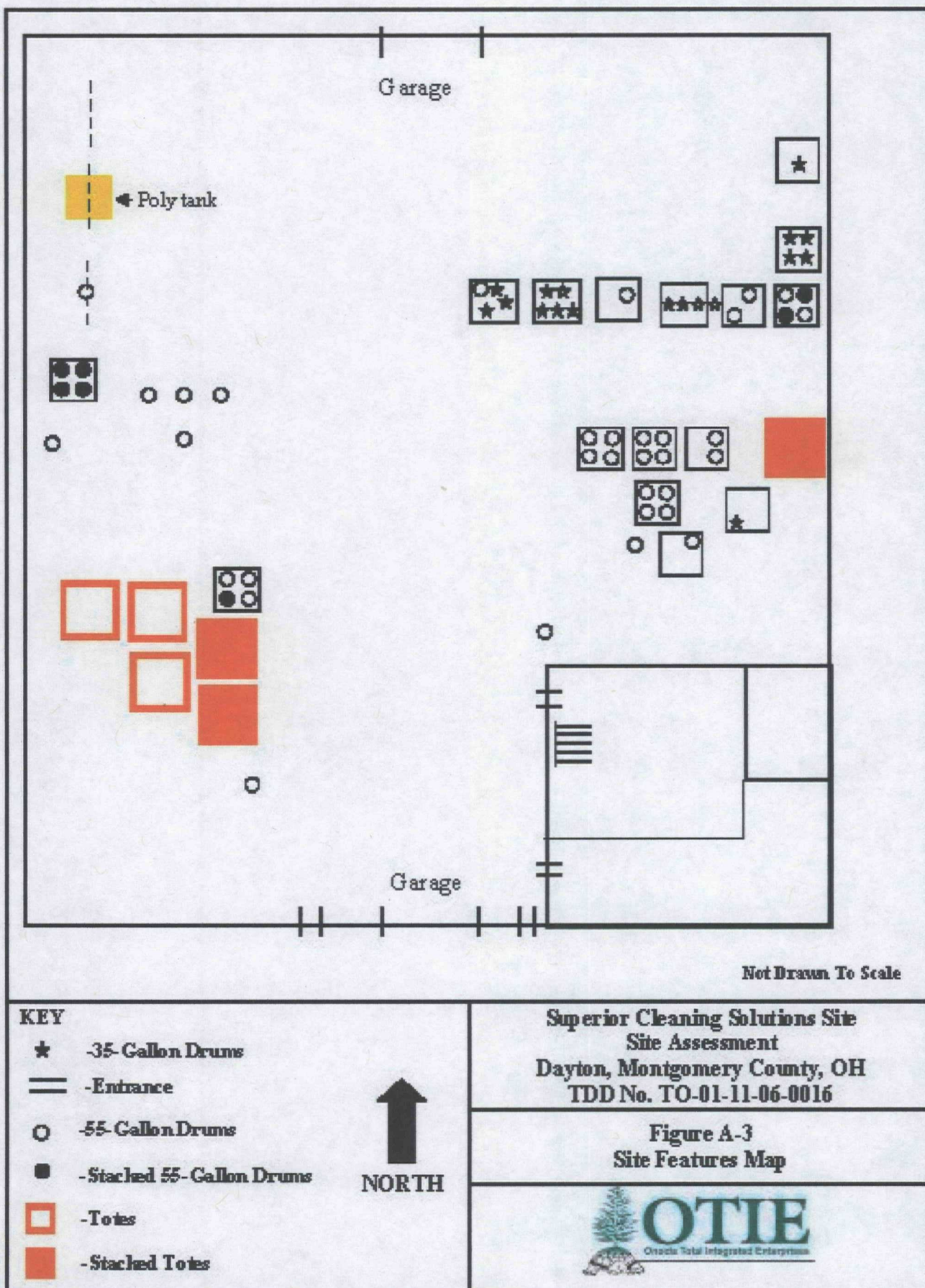


FIGURE A-4
PHOTOGRAPHIC DOCUMENTATION



Photo 1: View of the abandoned SCS facility



Photo 2: Drums containing corrosive wastes



Photo 3: Outdoor drums between buildings



Photo 4: Flammable and Corrosive drums stacked on pallets



Photo 5: Waste stains around floor drain



Photo 6: Abandoned 55-gallon drums

TABLE B-1

**U.S. EPA ANALYTICAL RESULTS
SUPERIOR CLEANING SOLUTIONS SITE**

TABLE B-1

**U.S. EPA ANALYTICAL RESULTS
SUPERIOR CLEANING SOLUTIONS SITE**

Parameter	Regulatory Limit	Sample Designation				
		SCS-002	SCS-003	SCS-004	SCS-005	SCS-006
Flashpoint (°F)	< 140 °F	NA	91	108	136	NA
Total VOCs (mg/L)						
Ethylbenzene	NRL	NA	180,000	NA	NA	NA
Xylenes, Total	NRL	NA	700,000	NA	NA	NA
pH	Liquid Sample Less than 2.0 or Greater than 12.5	<2.0	8.5	NA	3.9	<2.0
Container type		55-gal poly	55-gal steel	55-gal steel	55-gal steel	35-gal poly
Label Information		Scale-Away Corrosive	Xylene Flammable	Xylene Flammable	Methyl alcohol	Fluorosilicic Acid Corrosive

Notes:

Bold and shaded - result exceeds the Regulatory Level

< - Less than

> - Greater than

°F - Degrees Fahrenheit

mg/L - milligrams per liter

NA - Not analyzed

ND - Not detected above method detection limit

NRL - No Regulatory Level established

TABLE B-1

**U.S. EPA ANALYTICAL RESULTS
SUPERIOR CLEANING SOLUTIONS SITE**

TABLE B-1

**U.S. EPA ANALYTICAL RESULTS
SUPERIOR CLEANING SOLUTIONS SITE**

Parameter	Regulatory Limit	Sample Designation				
		SCS-007	SCS-009	SCS-010	SCS-012	SCS-013
Flashpoint (°F)	< 140 °F	NA	NA	NA	NA	NA
Total VOCs (mg/L)						
Ethylbenzene	NRL	NA	NA	NA	NA	NA
Xylenes, Total	NRL	NA	NA	NA	NA	NA
pH	Liquid Sample Less than 2.0 or Greater than 12.5	12.3	11.7	>12.4	<2.0	>12.4
Container type		55-gal poly	35-gal poly	55-gal poly	55-gal poly	55-gal poly
Label Information:		None	Caustic Soda	Grease Release	Hydrochloric Acid Corrosive	None

Notes:

Bold and shaded - result exceeds the Regulatory Level

< - Less than

> - Greater than

°F - Degrees Fahrenheit

mg/L - milligrams per liter

NA - Not analyzed

ND - Not detected above method detection limit

NRL - No Regulatory Level established

TABLE B-1

**U.S. EPA ANALYTICAL RESULTS
SUPERIOR CLEANING SOLUTIONS SITE**

TABLE B-1

**U.S. EPA ANALYTICAL RESULTS
SUPERIOR CLEANING SOLUTIONS SITE**

Parameter	Regulatory Limit	Sample Designation					
		SCS-015	SCS-020	SCS-021	SCS-022	SCS-024	SCS-025
Flashpoint (°F)	< 140 °F	81	NA	NA	NA	<32	133
Total VOCs (mg/L)							
Ethylbenzene	NRL	NA	NA	NA	NA	NA	NA
Xylenes, Total	NRL	NA	NA	NA	NA	NA	NA
pH	Liquid Sample Less than 2.0 or Greater than 12.5	NA	<2.0	>12.4	<2.0	NA	NA
Container type		55-gal steel	55-gal poly	55-gal poly	55-gal poly	55-gal steel	55-gal steel
Label Information		Isopropanol	Phosphoric Acid	Sodium Hydroxide	Sulfonic Acid	None	None

Notes:

Bold and shaded - result exceeds the Regulatory Level

< - Less than

>- Greater than

°F - Degrees Fahrenheit

mg/L - milligrams per liter

NA - Not analyzed

ND - Not detected above method detection limit

NRL - No Regulatory Level established

ATTACHMENT 1

**DETAILED CLEANUP CONTRACTOR COST ESTIMATE
INDEPENDENT GOVERNMENT CLEANUP CONTRACTOR ESTIMATE**

**SUPERIOR CLEANING SOLUTIONS SITE
DAYTON, MONTGOMERY COUNTY, OHIO**

SEPTEMBER 2011

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ATTACHMENT II

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION**

**ADMINISTRATIVE RECORD
FOR
SUPERIOR CLEANING SOLUTIONS SITE
DAYTON, MONTGOMERY COUNTY, OHIO**

SEPTEMBER 2011

<u>Date</u>	<u>Author</u>	<u>Recipient</u>	<u>Title/Description</u>	<u>Pages</u>
07/01/07	Chemical Mang.	Public	2007 Product Brochure	11
08/01/07	ATSDR	Public	ATSDR ToxFAQs for Xylene	2
06/28/11	DFD	Superior Cleaning Solutions	Notice of Violation	5
07/08/11	Caudill, M. DFD	Renninger, S. U.S. EPA	Request for Assistance Letter	1
08/10/11	McCoy, B. OEPA	Durno, M. U.S. EPA	OEPA Request for Assistance Letter	2
08/11/11	Renninger, S. U.S. EPA	Altman, C. Ohio EPA	Request for ARARs	2
00/00/00	OTIE	U.S. EPA	U.S. EPA Site Assessment Report (pending)	
00/00/00	Renninger, S. U.S. EPA	Karl, R. U.S. EPA	Action Memorandum for the SCS Site (pending)	

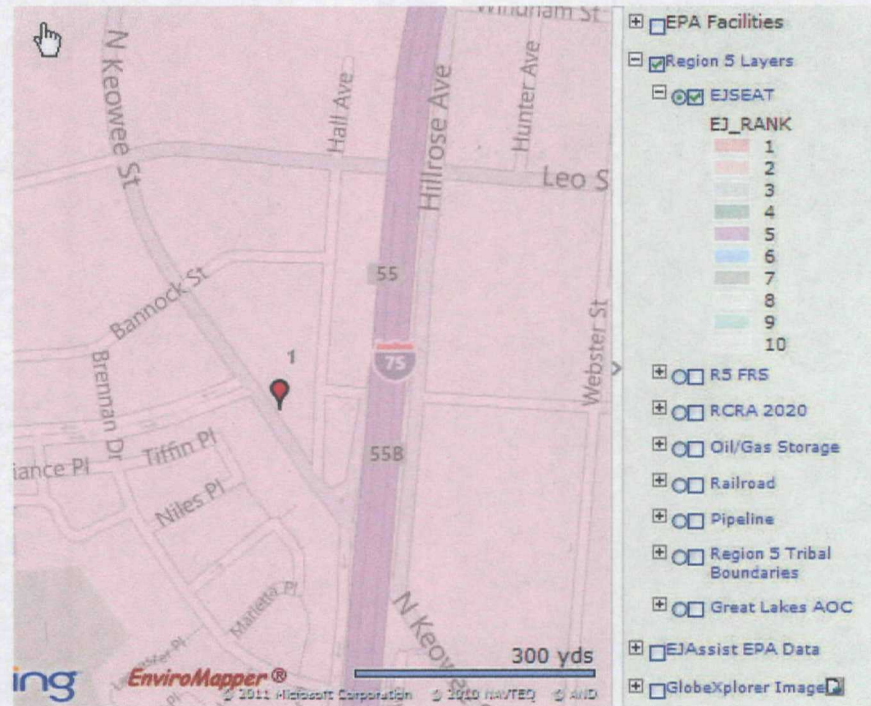
ATTACHMENT III
REGION 5 EJ ANALYSIS

R5 Superfund EJ Analysis for the Superior Cleaning Solutions Site

The area surrounding the Superior Cleaning Solutions Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to U.S. EPA Region 5. The Superior Cleaning Solutions Site is in a census tract with a score of 1 (Figure 1). Therefore, Region 5 considers this site to be a high-priority potential EJ area of concern.

Figure 1.

Superior Cleaning Solutions Site Map Showing EJ SEAT Values For Surrounding Area



ATTACHMENT 4

INDEPENDENT GOVERNMENT COST ESTIMATE

**SUPERIOR CLEANING SOLUTIONS SITE
DAYTON, MONTGOMERY COUNTY, OHIO**

SEPTEMBER 2011

(REDACTED 2 PAGES)